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ENGINEERING AND COMPLIANCE DIVISION	APPL. NO.	See below
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
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**PERMIT TO
CONSTRUCT/OPERATE EVALUATION**

Applicant's Name	Los Angeles Times Communications LLC
Company ID	124904
Mailing Address	2000 E 8th Street Los Angeles, CA 90021
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION:

A/NO. 517042

INTERNAL COMBUSTION ENGINE, CATERPILLAR, EMERGENCY ELECTRICAL GENERATION, MODEL NO. 3406B, DIESEL-FUELED, 6 CYLINDERS, TURBOCHARGED, AFTERCOOLED, 417 BHP.

A/NO. 517043

INTERNAL COMBUSTION ENGINE, NO. 1, CATERPILLAR, EMERGENCY ELECTRICAL GENERATION, MODEL NO. 3516, DIESEL-FUELED, 16 CYLINDERS, TURBOCHARGED, AFTERCOOLED, 2,151 BHP.

A/NO. 517044

INTERNAL COMBUSTION ENGINE, NO. 2, CATERPILLAR, EMERGENCY ELECTRICAL GENERATION, MODEL NO. 3516, DIESEL-FUELED, 16 CYLINDERS, TURBOCHARGED, AFTERCOOLED, 2,151 BHP.

A/NO. 517045

INTERNAL COMBUSTION ENGINE, NO. 3, CATERPILLAR, EMERGENCY ELECTRICAL GENERATION, MODEL NO. 3516, DIESEL-FUELED, 16 CYLINDERS, TURBOCHARGED, AFTERCOOLED, 2,151 BHP.

BACKGROUND:

Los Angeles Times submitted these permit application as Class III (Admin. Change of permit conditions) on 12/21/2010 for Permit to Operate to update permit conditions to comply with Rule 1470. This is an existing facility in Los Angeles. This facility has permits to operate for 6 lithographic printing presses, 5 emergency ICEs, 2 boilers, 1 Ammonia storage tank and 1 ink dewatering system. The subject emergency engines are operating under permits to operate nos. F40302, F96101-3. This is a Title V facility and currently operates under a Title V facility permit

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that was issued on May 6, 2002. The first renewal was issued on May 6, 2007. Review of the compliance file for this facility reveals that there are no records of nuisance complaints. However, there is a Notice to Comply issued to the company on March 19, 2010 to provide proof of timing retard on emergency engines and boiler source test. The facility provided the required data on March 31, 2010.

PROCESS DESCRIPTION:

The company is in business of printing daily newspaper. The emergency engines provide power to the facility in case of outage. The operating hours are 1 hr/day, 1 days/week, and 30 weeks/yr for engine under a/no. 517042 and 1 hr/day, 1 days/week, and 50 weeks/yr for engines under a/nos 517043-45.

EMISSIONS AND ANALYSIS:

The company provided factors for criteria pollutants that were used to calculate emissions. For emission calculations, please refer to attached spreadsheet. There is no emissions increase from the proposed change of conditions on the emergency engines permits.

RULES:

- Rule 212(c)(1): This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. Since there are no schools within 1,000 feet of the facility, a public notice will not be required per this section.
- Rule 212(c)(2) & (g): These sections require a public notice for all new or modified facilities which have on-site emission increases for the equipment or the facility exceeding any of the daily maximums as specified in subdivision (g). Since no emission increase from the equipment or facility is expected, public notice will not be required by this section.
- Rule 212(c) (3): There will not be an increase in TACs resulting from the use of emergency ICEs. Therefore, a public notice will not be required per this section.
- Rule 401 With proper operation of this equipment, the visible emissions from the engines are not likely to violate requirements of this rule.
- Rule 402 Operation of equipment is not expected to create a nuisance.
- Rule 1110.2 Emergency engines are exempt from requirements of this rule.
- REG. XIII The proposed change of conditions on the emergency engines permits will not result in increase of criteria pollutants emissions. Therefore, BACT requirements, modeling, or emissions offsets are not triggered.
- Rule 1401: The proposed change of conditions on the emergency engines permits will not result in any increase air toxic contaminants; therefore, compliance with the requirements in this rule is expected.

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Regulation XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility as the company also plans to modify one of its existing printing presses along with this admin change applications.

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the emission threshold levels on the following page:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is 2nd permit revision to the Title V renewal permit issued to this facility on May 6, 2007. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued.

Title V Permit Revisions Summary

	Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
2nd	Permit Revision: Alteration to existing press to expand Color capacity (a/no. 517137), Admin Change on emergency engines (a/nos 517042-45.) to comply with Rule 1470.	0	0	0	0	0	0
Cumulative Total		0	0	0	0	0	0
Maximum Daily		30	30	40	30	60	220

Since the cumulative emission increases resulting from permit revision are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimis significant permit revision”.

CONCLUSION:

The proposed project is expected to comply with all applicable District Rules and Regulations. Also, since the proposed project is considered as a “de minimis significant permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed facility permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule

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3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.